

## **REMARKS**

The Applicants have carefully reviewed and considered the Examiner's Action mailed July 14, 2006. Reconsideration is respectfully requested in view of the foregoing amendments and the comments set forth below.

By this Amendment, claims 1-2, 4, 8-9, 11-13, and 15-18 are amended. Accordingly, claims 1-20 are pending in the present application.

Claims 1-20 were rejected under 35 U.S.C. §112, second paragraph for the reason set forth in the middle of page 2 of the Action. By the foregoing amendments, independent claims 1, 15 and 18 are amended to explicitly recite a pointing device as part of the interactive whiteboard display system and to define a plurality of remote signaling devices. Accordingly, claims 1-20 are fully definite under 35 U.S.C. §112, second paragraph, and withdrawal of that rejection is respectfully requested.

Claims 1, 4-5, 7, 10, 13, 15, and 17-19 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,683,628 to Nakagawa in view of U.S. Patent No. 6,065,076 to Sorenson as described in the paragraphs spanning pages 3-6 of the Action. This rejection is respectfully traversed.

The Examiner has summarized the teachings of Nakagawa as including "at least one signaling means". In actuality, Nakagawa discloses, as exemplified by Figure 4, a conventional interactive whiteboard system including a projector (3), a device (2) onto which an image is projected from the projector, computing means (4) and a pen 1 (e.g., a pointing device), which is different that the recited signaling means recited in the claims. As stated above, independent claims 1, 15 and 18 have been amended to positively recite a "pointing device" and a plurality of "remote signaling devices". Thus, Nakagawa fails

to disclose an interactive whiteboard display system with a pointing device and a plurality of remote signaling devices.

In addition, since Nakagawa fails to teach the plurality of remote signaling devices in addition to a pointing device, the statement in the Action referring to the “communications hub” should not include the remote signaling devices as Nakagawa does not disclose such devices. As such, the device onto which an image is projected in Nakagawa is not arranged to have a receiver portion for receiving signals from a plurality of remote signaling devices. The device onto which an image is projected in Nakagawa is, therefore, not the recited “communications hub of the display system” that includes both a pointing device and a plurality of remote signaling devices.

The secondary reference to Sorenson is directed to a system for tailoring information presented to a user and the manner of information selection and presentation by having two ports for accepting a selected information card and a system card. That is, Sorenson does not disclose an interactive whiteboard display system. Instead, Sorenson discloses a portable graphic communications tablet (1) that may be held in the hand of a user and includes a display (7). The device taught by Sorenson is clearly a device for personal use by an individual user, whereas the interactive whiteboard display of Nakagawa is a system for presenting information to a plurality of users. Consequently, any teaching relating to a portable graphics communication tablet such as disclosed by Sorenson is therefore not extendable automatically to an interactive whiteboard system. The Examiner has failed to point out what motivation there would be for one of ordinary skill in the art reviewing the disclosure of Nakagawa directed to an interactive whiteboard display to turn to a portable graphics communication tablet arrangement as

taught by Sorenson. It is respectfully submitted that there is no motivation, except Applicants' own specification.

Furthermore, even if one of ordinary skill in the art reading Nakagawa considered the teachings of Sorenson, he would not find a teaching that would be useful for incorporation into a interactive display system, but for individual tablets. It is submitted that there is no reason for the skilled person to conclude that an individual tablet teaching is relevant for an interactive whiteboard system as disclosed in Nakagawa.

Consequently, Sorenson cannot teach or suggest modifying the "communications hub" of Nakagawa to receive control signals from a plurality of remote signaling devices and a pointing device in order to control an image on the interactive whiteboard (device onto which an image is projected, as recited in independent claims 1, 15 and 18 of the present application.

In the second instance, it is pointed out that the teaching of Sorenson is incompatible with the teachings of Nakagawa. The Examiner's position appears to be based on the assumption that the portable graphics communication tablet of Sorenson can be considered to be an equivalent to the whiteboard display device of Nakagawa. According to the Examiner, Sorenson teaches a remote signaling device. However, column 4, lines 10-13 of Sorenson disclose substituting the electronic pen (8) with an infrared remote device (16). Consequently, the electronic pen (1) or pointing device of Nakagawa would be substituted for a infrared remote device based on the teachings of Sorensen. This would not provide a whiteboard interactive display system with a pointing device and remote signaling devices as required by independent claims 1, 15 and 18 of the present application.

Further, the Nakagawa/Sorenson combination is flawed since an essential characteristic of an interactive whiteboard display is to provide a pointing device, such as the pen (1) of Nakagawa. The portable graphics communications tablet of Sorenson is intended to be used by an individual user at close-quarters. The purpose of the remote device (16) taught by Sorenson is to enable a user who is unable to use the electronic pen (8) to interact with the display, but the user still must be at close-quarters with the tablet display in order to read the display. That is, the remote device is an alternative to an electronic pen, or a teacher that controls the tablet remotely. Consequently, Sorenson does not suggest or provide motivation to modify Nakagawa to have a plurality of remote signaling devices (as a teacher only needs one signaling device) as required by the claims 1, 15 and 18 of the present application.

The Examiner states his motivation for combining Nakagawa and Sorenson as “to provide disable users the ability to more easily interact with the system”. That is, the electronic pen (8) of Sorenson would be replaced with a remote signaling device. This does not provide motivation to modify an interactive whiteboard display device. According to Sorenson, the teacher has a remote device and thus, a pointer is not needed. There is nothing else that suggests that Nakagawa and Sorenson should be combined. Even if combined, the applied combination would not result in the claimed invention: an interactive whiteboard display system with a pointer and a plurality of signaling devices. Still, more specifically, there is no suggestion in either Nakagawa or Sorenson that a display device of an interactive whiteboard system comprising a pointing device and a plurality of remote devices could be a communications hub of such a interactive whiteboard system. Consequently, even if combined, Nakagawa and Sorenson cannot

render the claimed invention obvious and withdrawal of the rejection of claims 1, 4-5, 7, 10, 13, 15, and 17-19 under 35 U.S.C. §103(a) is respectfully requested.

Claims 2 and 3 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Sorenson in view of U.S. Patent No. 5,561,446 to Montlick for the reasons set forth in the paragraphs spanning pages 6-7 of the Action. Claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Sorenson in view of U.S. Patent No. 5,583,323 to Zurstadt as described in the paragraphs spanning pages 7-8 of the Action. Claims 8 and 12 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Sorenson in view of U.S. Patent No. 5,790,114 to Geaghan for the reasons set forth in paragraphs spanning pages 8-9 of the Action. Claim 9 was rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Sorenson in view of U.S. Patent No. 4,538,993 to Krumholz as described in the middle paragraph of page 9 of the Action. Claim 11 was rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Sorenson in view of U.S. Patent No. 5,689,562 to Hassan et al. (hereinafter referred to as “Hassan” as described in the paragraph spanning pages 9-10 of the Action. Claims 14 and 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Sorenson in view of U.S. Patent No. 5,528,235 to Lin et al. (hereinafter referred to as “Lin”) and U.S. Patent No. 5,854,621 to Junod et al. (hereinafter referred to as “Junod”), respectively for the reasons set forth in paragraphs spanning pages 10-11 of the Action. Finally, claim 20 was rejected under 35 U.S.C. §103(a) as being unpatentable over Nakagawa-Sorenson in view of Montlick and Junod as explained in the paragraph spanning pages 11-12 of the Action. These rejections are respectfully traversed.

For the reasons set forth in the Amendment entered with the filing of the RCE on

October 16, 2006, Montlick, Zurstadt, Geaghan, Krumholz, Hassan, Lin and Junod fail to disclose a plurality of signaling devices in addition to a pointing device for an interactive whiteboard display system. Thus, the above references cannot provide the missing teachings and/or motivation to modify Nakagawa to obtain the interactive whiteboard display system according to the claimed invention set forth in independent claims 1, 15 and 19 and their depending claims in the present application. Since the claims rejected by the above references depend from allowable independent claims, it is submitted that the dependent claims are allowable as well.

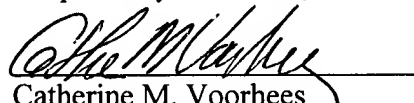
In view of the foregoing amendments and the comments distinguishing the claimed invention from the prior art of record, it is believed that claims 1-20 are allowable over the prior art of record and Applicants request withdrawal of the above rejections. Accordingly, it is respectfully requested that a Notice of Allowance be issued indicating that claims 1-20 are allowed over the prior art of record.

Should the Examiner believe that a conference would advance the prosecution of this application, the Examiner is encouraged to telephone the undersigned counsel to arrange such a conference.

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